

# **EXHIBIT 3**

1 Declaration of Gabriel Antonio Manzanilla Pedron  
2

A#

BOP#

- 5 ① I, Gabriel Antonio Manzanilla Pedron, am  
6 currently detained at FCI Victorville II.  
7
- 8 ② I arrived to FCI Victorville on July 20, 18.  
9
- 10 ③ I am seeking asylum in the U.S.  
11
- 12 ④ I am currently housed with one other  
13 person in unit A. Before that I was  
14 housed with someone I could not  
15 communicate with because he did  
16 not speak Spanish. Later I got a  
17 Spanish speaking person in the  
18 cell with me but he was transferred  
19 a couple days later. I was alone for  
20 2 weeks after that.
- 21
- 22 ⑤ When I first arrived I was stripped  
23 searched and injected with something  
24 that they did not tell me what it  
25 was. I was given a questionnaire  
26 that asked my current <sup>mental</sup> state and  
27 I checked off that I was depressed.
- 28

Gabriel Antonio Manzanilla Pedron

I have not received any follow up regarding the depression.

(6.) The first day I arrived to Victorville I had a cough and quickly developed a fever. I asked for medication and to be seen by a doctor and was told it was nothing serious by a guard. Another guard also told me a cough was not severe and I would not be seen.

(7) I currently suffer from anxiety, phobia and depression. I no longer ask for medical or mental health because I've asked for medical help and was denied. I am scared to ask for help. I've heard others have been mocked by guards for asking for help or saying they are depressed. One of the guards threatens to lock you up for two days if you claim you are depressed. I've heard a guard tell another detainee that



1  
2 he should have thought about  
3 being dephased before he got here.  
4

5 ⑧ By phobia I mean that I hate  
6 being locked in, or hearing  
7 doors locked. it makes me jump,  
8 it startles me.

9  
10 ⑨ I've had a really hard time here  
11 because my thoughts race and  
12 I remember some of the horrible  
13 things that I've escaped in  
14 my country. This place looks  
15 like the places I was fleeing.  
16 I know its hard for other people  
17 too. I've heard them crying. one  
18 time I heard someone saying he  
19 was going to kill himself.  
20 I don't know what happened  
21 to him.

22  
23 ⑩ When people were being quarantined  
24 due to chicken pox for 21 days at  
25 a time, the detainee in the cell  
26 in front of mine refused to  
27 be quarantined for the second time.

1  
2 he began to protest and shout  
3 that it was a violation of his  
4 human rights because he was healthy.  
5 He laid on the floor shouting  
6 from underneath the door, guards  
7 began to yell at him to stand  
8 up. Then they came into his  
9 cell and pulled him out and  
10 tased him. The detainee never  
11 threatened the guards. I have  
12 not seen him again.

14 (1) There are guards who say nasty  
15 things to us. One time a guard  
16 called a detainee "girerita" or  
17 little blonde girl. Another  
18 guard accused a detainee of  
19 being a "barmen" or gangster  
20 which could be very dangerous  
21 for him. #

23 (2) Because of all this I am  
24 afraid to ask guards for any  
25 help when I feel sad or sick.

27 (3) There are no forms to request

1  
2 medical help you just have to ask  
3 the guards.  
4

5 (14) When I first arrived to Victorville  
6 I was completely locked in the  
7 cell for 4 days. During that  
8 time we did not have access to  
9 the showers or to a change of  
10 clothes. All the food we were  
11 given was frozen.  
12

13 (15) They began to let us out a little  
14 bit more. We got to go to the  
15 dining hall but we were only  
16 given 3-5 minutes to eat.  
17 When we went outside it was  
18 only for 30 minutes.  
19

20 (16) Now we go out for about 2  
21 hours usually after lunch. There  
22 is no written schedule.  
23

24 (17) I've noticed prisoners get to go  
25 out for 3 hours at a time. I  
26 feel like we are being treated  
27 worse than prisoners.  
28

Gabriel Antonio Mazurilla Pedron

DECL. OF

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2 (18) They do count for us at 10:00am,  
3 at 4:00pm, and 9:30 right before  
4 lights out. I asked a guard why  
5 they count us and a guard  
6 said that we are not prisoners  
7 but we are in a prison and have  
8 to follow prison rules. For count  
9 we need to be standing in front  
10 of the door. I saw a guard  
11 threaten to hit somebody because  
12 he did not get up fast enough  
13 at 9:30 because he was  
14 already in bed. The guards  
15 also come by in the middle  
16 of the night. Their flashlight  
17 has woken me up.

19 (19) We recently started getting about  
20 10 minutes to eat. And we just  
21 got a few more sets of cards  
22 to play with in the day room.  
23 As well as a few novels. I have no radio.

24 (20) I am a practicing 7th day Adventist  
25 Christian. I have practiced this faith  
26 for over 20 years. My religious  
27 beliefs are sincerely held.

Gabriel Antonio Manzanilla Pedron

1  
2 (21) Going to church services and  
3 participating in group prayer  
4 or Bible study is important part  
5 of my religious exercise. At  
6 Victoria there have not been  
7 any church services and we are  
8 not allowed to attend any of  
9 the prisoners centers if they have  
10 them.

11  
12 (22) We have tried to meet as a group  
13 informally for Bible study and  
14 an officer broke us up and  
15 told us it was not allowed.  
16 Without being able to go to a  
17 group meeting for church I feel  
18 sad. I told prison staff that wanted  
19 to go to a church and he said  
20 I was a prisoner and couldn't  
21 go anywhere.

22  
23 (23) My primary language is Spanish.  
24 Reading the Bible in Spanish  
25 is an important part of my  
26 religion. When I first got here  
27 there weren't any Bibles. I told

the guard I travelled with one and asked if he could get me mine and he said no. When I first got here there was one Spanish Bible that another detainee had.

When he was transferred he gave it to me. Just last week we got 2 more Bibles. We now have a total of 3 Bibles for about 15 people.

(24) We are also not allowed to sing hymns or prayer songs. This is an important part of my religion but we are not allowed. Last night I heard the guards stop another detainee from singing the songs of his faith. He hit his door as he shouted for him to be quiet.

(25) I've written a letter to complaint about the conditions. We have also considered a hunger strike.

I, Gabriel Antonio Manzanilla Pedron, declare under penalty of perjury that the foregoing is true and correct and that this declaration was completed and signed on ~~July~~ August 16, 2018 at Victorville, California ~~inmate~~

Gabriel Antonio Manzanilla Pedron

I, Claudia Ceseña, declare:

1. I am fluent in Spanish and English.
2. On August 15, 2018, I provided interpretation services to Nancy Harris when she was meeting with detainees at FCI Victorville.
3. I provided interpretation services for Nancy Harris when she met Mr. Fabio Jose Serrano Solorzano, who speaks Spanish.
4. I communicated the contents of the Mr. Serrano Solorzano's declaration to him by accurately translating from English to Spanish.
5. On August 16, 2018, I provided interpretation services to Elizabeth Jordan when she was meeting with detainees at FCI Victorville.
6. I provided interpretation services for Elizabeth Jordan when she met with the following detainees, all of whom speak Spanish:
  - a. Yoni Santiago Gutierrez Gonzalez
  - b. Noe Siles
  - c. Gabriel Manzanilla Pedron
  - d. Alex Armando Villalobos Veliz
7. I communicated the contents of Mr. Gutierrez Gonzalez's declaration to him by accurately translating from English to Spanish.
8. I communicated the contents of Mr. Siles' declaration to him by accurately translating from English to Spanish.
9. I communicated the contents of Mr. Manzanilla Pedron's declaration to him by accurately translating from English to Spanish.
10. I communicated the contents of Mr. Villalobos Veliz's declaration to him by accurately translating from English to Spanish.

I declare under penalty of perjury of the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on September 5, 2018 in Oakland, California.



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Claudia Ceseña